

EXHIBIT 4



Department of the Treasury
Internal Revenue Service
Appeals Office
300 North Los Angeles Street
MS LA-8000 Room 3054
LOS ANGELES, CA 90012

AVX CORPORATION
%EMILE ARTUS
1 AVX BLVD
FOUNTAIN INN, SC 29644-9039

Date: **JAN 22 2020**

Person to contact:
Name: Chester Chau
Employee ID Number: 1000235615
Phone: 213 372-4230
Fax: 855 751-2925
Hours:
Re:
Penalty Appeal
Tax periods ended:
03/2012 03/2013 03/2014
Amount of assessed penalties:
\$ 600,000
I.R.C. sections:
6038B

Dear AVX CORPORATION:

I completed my review of your request to adjust the penalties assessed against you. Based on the information submitted, I am pleased to advise you my recommendation is to abate (remove) \$100,000.00 of the \$600,000.00 penalty stated above and your case is closed in Appeals. When this action has been completed, you will receive an adjustment notice from the IRS Service Center which originally assessed the penalty. The remaining penalty of \$500,000.00 is sustained for the following reasons:

Application of facts and law.

Payment information

Interest and penalties continue to accrue on the balance due until date of payment. If you have not paid the balance due in full, you may send your payment to the Internal Revenue Service Center address listed on your notice. Please make your check, money order or cashier's check payable to the U.S. Treasury.

What to do if you don't agree

If you do not agree with this determination, your next level of appeal of the penalties would be to file a formal suit with either the United States District Court or the United States Court of Federal Claims. To continue the appeal you must:

- Pay the balance due on the assessed penalties
- File a claim on Form 843, Claim for Refund and Request for Abatement, with the Service Center that processed the applicable return and include a statement requesting your claim be immediately disallowed.
- You'll receive a formal notice of claim disallowance
- You have two years from the date of this formal claim disallowance to bring formal suit

For information about procedures for filing suit in either of the courts, contact the clerk of your United States District Court or of the United States Court of Federal Claims.

After your case is closed, you may be contacted by an outside vendor who will request your participation in an Appeals customer satisfaction survey. Participation in the survey is voluntary and the vendor will not ask for any personal or financial information. We are committed to continuously improving the Appeals process through feedback from our customers. If you are selected, your opinion of the Appeals process would be very much appreciated.

However, if you have any additional questions, please contact the person listed on the first page of this letter.

Sincerely,

A handwritten signature in black ink, appearing to read "Anita R. Allis", with a stylized flourish at the end.

Anita R Allis
Appeals Team Manager

Enclosures:

cc: George B Abney